

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-4532-00105/00001

Effective Date: 12/28/2017 Expiration Date: 11/16/2027

Permit Issued To:SCEPTER NEW YORK INC

11 LAMB RD

SENECA FALLS, NY 13148

Contact: NATHAN TOOLEY

SCEPTER INC

1485 SCEPTER LANE WAVERLY, NY 14892

Facility: SCEPTER NEW YORK INC

11 LAMB RD

SENECA FALLS, NY 13148

Contact: CHAD TUCKER

SCEPTER NEW YORK INC

11 LAMB RD

SENECA FALLS, NY 13148

(315) 568-4225

Description:

Renewal and modification of Air State Facility permit for Scepter Inc for its scrap aluminum processing operations at its Seneca Falls Facility, located at 11 Lamb Road in the Village of Seneca Falls. Facility operations include loading and melting of scrap aluminum and fluxing agents, casting of aluminum ingots, and handling and disposal of the waste "salt cake", which is the fluxing agent combined with impurities.

A third furnace (previously permitted) has been recently installed and stack tested. The draft permit includes updates to control parameters and monitoring requirements to ensure compliance with the secondary aluminum national emission standard for hazardous air pollutants (NESHAP) requirements of 40 CFR 63 Subpart RRR from this third furnace as well as the original two furnces.

As part of this application Scepter has proposed to inject hydrated lime to control emission of acid gases from the three furnaces. The draft permit includes conditions related to this revised control technology.

The draft permit includes limitations which will cap Scepter's emissions below major source thresholds and will limit PM and HAP emissions as well as other high toxicity air contaminants.

The previously permitted fourth furnace will not be installed and is not included in this permit.

Previously permitted activities include:

Mod 1 authorizes the addition of two furnaces to the single Facility Emission Unit, 1-FURNS, expanding facility scrap aluminum processing operations. These two furnaces were originally authorized in the original State Facility Permit, but were not constructed with the two existing furnaces. After February 11, 1999, the addition of new furnaces became subject to the secondary aluminum national emission standard for hazardous air pollutants (NESHAP) requirements of 40 CFR 63 Subpart RRR.

Mod 1 maintains an existing 100 ton per year Title V cap on total particulate emissions, and adds Special Permit Conditions to restrict scrap processed to limit emissions as follows:

Limits emissions of hydrogen chloride (HCl) in the modified permit to less than 10 tons per year, to restrict facility hazardous air pollutant (HAP) emissions below the Part 201-6 (Title V) threshold of 10 tons per year of any individual HAP compound, and 25 tons per year of all HAP combined.

Limits emissions of ammonia (NH3) from acid gas control devices to 145 tons per year in the modified permit to keep concentrations below the Department's air guideline concentration (AGC) for any off site receptor.

Limits emissions of hydrogen fluoride (HF) in the modified permit to 0.265 pounds per hour (1.16 tons per year) to ensure compliance with HF standards in 6NYCRR Part 257-8.

In addition, Special Permit Conditions in the modified permit will expand facility monitoring to ensure compliance with Part 212.4c particulate, and Part 212.6a opacity standards.

Finally, 40 CFR 63 Subpart RRR NESHAP requirements in the modified permit include stack testing for dioxins and furans for the two new furnaces. Dioxin and furan stack testing showed emissions from the two existing furnaces in compliance with the NESHAP standard.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: KIMBERLY A MERCHANT 6274 EAST AVON-LIMA RD

AVON, NY 14414-9519

DEC Permit Conditions Renewal 1/FINAL



Authorized Signature:	Doto: /		/
Aumonzeu Signature.	Date. /	/	



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers
Permit modifications, suspensions or revocations by the Department
Facility Level

Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



Facility DEC ID: 8453200105

DEC GENERAL CONDITIONS **** General Provisions **** GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 8
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 8 Headquarters Division of Environmental Permits 6274 Avon-Lima Road Avon, NY 14414-9519 (585) 226-2466



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY

PERMIT

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Permit Issued To:SCEPTER NEW YORK INC

11 LAMB RD

SENECA FALLS, NY 13148

Facility: SCEPTER NEW YORK INC

11 LAMB RD

SENECA FALLS, NY 13148

Authorized Activity By Standard Industrial Classification Code:

3341 - SECONDARY NONFERROUS METALS

Permit Effective Date: 12/28/2017 Permit Expiration Date: 11/16/2027



Permit ID: 8-4532-00105/00001 Facility DEC ID: 8453200105

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS **Facility Level**

- 1 6 NYCRR 215.2: Open Fires Prohibitions
- 2 6 NYCRR 202-1.1: Required Emissions Tests
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 6 6 NYCRR 202-1.5: Prohibitions
- 7 6 NYCRR 211.1: Air pollution prohibited
- 8 40CFR 63, Subpart A: General Provisions
- 9 40CFR 63.1505(i), Subpart RRR: Compliance Demonstration
- 10 40CFR 63.1506(b), Subpart RRR: Compliance Demonstration
- 11 40CFR 63.1506(d), Subpart RRR: Compliance Demonstration
- 12 40CFR 63.1510(e), Subpart RRR: Compliance Demonstration
- 13 40CFR 63.1511(a), Subpart RRR: Site Specific test plan required
- 14 40CFR 63.1515, Subpart RRR: Compliance Demonstration
- 15 40CFR 63.1515(b), Subpart RRR: Compliance Demonstration
- 16 40CFR 63.1516(b), Subpart RRR: Compliance Demonstration
- 17 40CFR 63.1517, Subpart RRR: Compliance Demonstration **Emission Unit Level**

18 6 NYCRR Subpart 201-7: Process Permissible Emissions

EU=1-FURNS

- 19 6 NYCRR 212-2.1 (b): Compliance Demonstration
- 20 40CFR 63.1506(m), Subpart RRR: Compliance Demonstration
- 21 40CFR 63.1515(b), Subpart RRR: Compliance Demonstration

EU=1-FURNS.Proc=001

- 22 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 23 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 24 40CFR 63.1505(k), Subpart RRR: Compliance Demonstration
- 25 40CFR 63.1506(c), Subpart RRR: Compliance Demonstration
- 26 40CFR 63.1510(b), Subpart RRR: Compliance Demonstration
- 27 40CFR 63.1510(f), Subpart RRR: Compliance Demonstration
- 28 40CFR 63.1510(h), Subpart RRR: Compliance Demonstration
- 29 40CFR 63.1510(i), Subpart RRR: Compliance Demonstration
- 30 40CFR 63.1510(j), Subpart RRR: Compliance Demonstration
- 31 40CFR 63.1510(s), Subpart RRR: Compliance Demonstration
- 32 40CFR 63.1510(t), Subpart RRR: Compliance Demonstration
- 33 40CFR 63.1510(u), Subpart RRR: Compliance Demonstration
- 34 40CFR 63.1510(w), Subpart RRR: Alternative Monitoring
- 35 40CFR 63.1511(b), Subpart RRR: Compliance Demonstration
- 36 40CFR 63.1511(g), Subpart RRR: Establishment of Monitoring and **Operating Parameter Values**
- 37 40CFR 63.1512(d)(1), Subpart RRR: Compliance Demonstration
- 38 40CFR 63.1512(j), Subpart RRR: Compliance Demonstration
- 39 40CFR 63.1512(n), Subpart RRR: Compliance Demonstration



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EU=1-FURNS,Proc=001,ES=BAG01

40 40CFR 63.1506(m), Subpart RRR: Compliance Demonstration

EU=1-FURNS,Proc=001,ES=BAG02

41 40CFR 63.1506(m), Subpart RRR: Compliance Demonstration

EU=1-FURNS,Proc=001,ES=BAG03

42 40CFR 63.1506(m), Subpart RRR: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS Facility Level

- 43 ECL 19-0301: Contaminant List
- 44 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 45 6 NYCRR Subpart 201-5: Emission Unit Definition
- 46 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 47 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 48 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 49 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 50 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=1-FURNS

- 51 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 52 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 53 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 54 6 NYCRR 212-2.1 (a): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



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FEDERALLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



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required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial



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Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)



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All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS The following conditions are federally enforceable.

Condition 1: Open Fires - Prohibitions

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 215.2

Item 1.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.



(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 2: Required Emissions Tests

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 2.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 3: Capping Monitoring Condition

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 3.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 3.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.



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Item 3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Facility total HAP emissions will be capped at less than 25 tons per year for total combined HAPs on a rolling 12-month basis. Records of metal and flux charged will be used in conjunction with AP-42 emission factors and particulate emission factors developed during stack testing and mass balances in order to calculate the rolling 12 month annual emissions.

All records shall be maintained on-site for a period of five years and made available to representatives of the department upon request. Records will be maintained in a format acceptable to the department.

On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the department that the facility has operated all emission sources within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: TOTAL HAP Upper Permit Limit: 25 tons per year



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 4.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 4.7:



Permit ID: 8-4532-00105/00001 Facility DEC ID: 8453200105

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Facility total HAP emissions will be capped at less than 10 tons per year for a single HAP on a rolling 12-month basis. Records of metal and flux charged will be used in conjunction with AP-42 emission factors and particulate emission factors developed during stack testing and mass balances in order to calculate the rolling 12 month annual emissions.

All records shall be maintained on-site for a period of five years and made available to representatives of the department upon request. Records will be maintained in a format acceptable to the department.

On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the department that the facility has operated all emission sources within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: TOTAL HAP Upper Permit Limit: 10 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 5: Capping Monitoring Condition

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 5.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6



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Item 5.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 5.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 5.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 5.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Facility PM emissions will be capped at less than 100 tons per year on a rolling 12-month basis. Records of metal and flux charged will be used in conjunction with AP-42 emission factors and particulate emission factors developed during stack testing and mass balances in order to calculate the rolling 12 month annual emissions.

All records shall be maintained on-site for a period of five years and made available to representatives of the department upon request. Records will be maintained in a format acceptable to the department.

On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall



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provide a certification to the department that the facility has operated all emission sources within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: PARTICULATES Upper Permit Limit: 100 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 6: Prohibitions

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 202-1.5

Item 6.1:

No person shall conceal an emission by the use of air or other gaseous diluents to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

Condition 7: Air pollution prohibited

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 211.1

Item 7.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 8: General Provisions

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 8.1:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and

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reporting requirements.

Condition 9: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1505(i), Subpart RRR

Item 9.1:

The Compliance Demonstration activity will be performed for the facility: The Compliance Demonstration applies to:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a group 1 furnace must use the limit in this condition to determine the emission standards for a Secondary Aluminum Processing Unit (SAPU) pursuant to §63.1505(k). The limit for Dioxins/Furans is 15 ug of D/F TEQ per Mg (2.1 x 10-4 gr of D/F TEQ per ton) of feed/charge from each group 1 furnace at a secondary aluminum production facility that is a major or area source. This limit does not apply if the furnace processes only clean charge.

The owner or operator may determine the emission standards for a SAPU by applying the group 1 furnace limits on the basis of the aluminum production weight in each group 1 furnace, rather than on the basis of feed/charge.

Upper Permit Limit: 15 micrograms of D/F TEQ per Mg

Reference Test Method: EPA METHOD 23

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 10: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(b), Subpart RRR



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Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator must provide and maintain easily visible labels posted at each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln that identifies the applicable emission limits and means of compliance, including:

- (1) The type of affected source or emission unit (e.g., scrap dryer/delacquering kiln/decoating kiln, group 1 furnace, group 2 furnace, in-line fluxer).
- (2) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

The owner or operator must inspect the labels for each group 1 furnace, group 2 furnace, in-line fluxer and scrap dryer/delacquering kiln/decoating kiln at least once per calendar month to confirm that posted labels are intact and legible.

Monitoring Frequency: MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 11: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(d), Subpart RRR

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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CAS No: 0NY100-00-0 TOTAL HAP

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must:

- (1) Except as provided in paragraph (3) of this condition, install, calibrate, operate and maintain a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
- (2) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
- (3) The owner or operator may chose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
- (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units within a SAPU; and
- (ii) All calculations to demonstrate compliance with the emission limits for SAPUs are based on aluminum production weight rather than feed/charge weight.
- (4) Feed/charge or aluminum production within SAPUs must be measured and recorded for each group 1 furnace and/or in-line fluxer.
- (5) The accuracy of the weight measurement device or procedure must be ± 1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
- (6) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.



(7) As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 12: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(e), Subpart RRR

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

(1) The accuracy of the weight measurement device or procedure must be ± 1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.



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(2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 13: Site Specific test plan required

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1511(a), Subpart RRR

Item 13.1:

Prior to conducting a performance test required by 40 CFR Part 63 Subpart RRR, the owner or operator must prepare and submit a site-specific test plan meeting the requirements in 40 CFR Part 63.7(c).

Condition 14: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1515, Subpart RRR

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator must submit initial notifications to the Administrator for area sources as described below:

As required by §63.9(b)(1), provide notification for an area source that subsequently increases its emissions such that the source is a major source subject to the standard.

As required by §63.9(b)(3), provide notification that the source is subject to the standard for a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date of this



subpart and for which an application for approval of construction or reconstruction is not required under §63.5(d).

As required by §63.9(b)(5), after the effective date of this subpart, provide notification of the intended construction or reconstruction of a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart. The notification must include all the information required for an application for approval of construction or reconstruction as required by §63.5(d). The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence.

As required by §63.9(d), provide notification of any special compliance obligations for a new source.

As required by §63.9(e) and (f), provide notification of the anticipated date for conducting performance tests and visible emission observations. The owner or operator must notify the Administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.

As required by §63.9(g), provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1515(b), Subpart RRR

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For existing sources, the notification of compliance status report is due 60 days after the compliance date

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established in §63.1501(a). For new affected sources, the report is due within 90 days after conducting the initial performance test required by §63.1511(b), or within 90 days after the compliance date established by §63.1501(b) if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the following information in an operating permit application, in an amendment to a permit application, in a separate submittal, or any combination. The notification of compliance status report must include:

- (1) All information required in §63.9(h) for notification of compliance status reports. The owner/operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
- (2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system)
- (3) Unit labeling as described in §63.1506(b), including process type or furnace classification and operating requirements.
- (4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., the lime injection rate, fabric filter inlet temperature, etc.), including the operating cycle or time period used in the performance test.
- (5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in §63.1506(c).
- (6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 63.1510(f).
- (7) Approved OM&M plan (Including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device)



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(8) Startup, shutdown, and malfunction plan, with revisions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1516(b), Subpart RRR

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Semiannual excess emissions/summary reports of shall be submitted according to the requirements in §63.10(e)(3). The semiannual reports shall be submitted within 60 days after the end of each 6-month reporting period. Each report must contain the information specified in §63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.

A report must be submitted if any of these conditions occur during a 6-month reporting period:

- (1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.
- (2) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
- (3) An affected source (including an emission unit in a secondary aluminum processing unit) was not operated according to the requirements of this subpart.
- (4) A deviation from the 3-day, 24-hour rolling average emission limit for a secondary aluminum processing unit, if applicable.

Results of any performance test conducted during the



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reporting period shall be submitted within 60 days after the date of completing each performance test. One complete report shall be submitted documenting test methods and procedures, associated fuel analysis, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

If there was a malfunction during the reporting period, the owner or operator must submit a report that includes the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken for each malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must include a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit, and a description of the method used to estimate the emissions, including, but not limited to, product-loss calculations, mass balance calculations, measurements when available, or engineering judgment based on known process parameters. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §§63.1506(a)(5).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 17: Compliance Demonstration Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1517, Subpart RRR

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

As required by §63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart. Records shall be retained for at least 5

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years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

In addition to the general records required by §63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain records of the following:

- (1) For each affected source and emission unit with emissions controlled by a fabric filter or a lime-injected fabric filter, the number of total operating hours for the bag leak detection system for the affected source or emission unit during each 6-month reporting period. Records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.
- (2) For each affected source and emission unit with emissions controlled by a lime-injected fabric filter:
- (A) Records of inspections at least once every 8-hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every 4-hour period for the subsequent 3 days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a brief explanation of the cause of the blockage and the corrective action taken;
- (B) If lime feeder setting is monitored, records of daily and monthly inspections of feeder setting, including records of any deviation of the feeder setting from the setting used in the performance test, with a brief explanation of the cause of the deviation and the corrective action taken. If a lime feeder has been repaired or replaced, this action must be documented along with records of the new feeder calibration and the feed mechanism set points necessary to maintain the lb/hr feed rate operating limit. These records must be maintained on site and available upon request.
 - (C) If lime addition rate for a noncontinuous lime



injection system is monitored pursuant to the approved alternative monitoring requirements in §63.1510(v), records of the time and mass of each lime addition during each operating cycle or time period used in the performance test and calculations of the average lime addition rate (lb/ton of feed/charge).

- (3) For each group 1 furnace, records of total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.
- (4) For each continuous monitoring system, records required by §63.10(c).
- (5) For each affected source and emission unit subject to an emission standard in kg/Mg (lb/ton) of feed/charge, records of feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
- (6) Records of monthly inspections for proper unit labeling for each affected source and emission unit subject to labeling requirements.
- (7) Records of annual inspections of emission capture/collection and closed vent systems or, if the alternative to the annual flow rate measurements is used, records of differential pressure; fan RPM or fan motor amperage; static pressure measurements; or duct centerline velocity using a hotwire anemometer, ultrasonic flow meter, cross-duct pressure differential sensor, venturi pressure differential monitoring or orifice plate equipped with an associated thermocouple, as appropriate.
- (8) Records for any approved alternative monitoring or test procedure.
- (9) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
 - (A) OM&M plan; and
- (B) Site-specific secondary aluminum processing unit emission plan (if applicable).
- (10) For each secondary aluminum processing unit, records of total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production,



total aluminum produced for each 24-hour period and, if applicable, calculations of 3-day, 24-hour rolling average emissions.

- (11) For any failure to meet an applicable standard, the owner or operator must maintain the following records;
- (A) Records of the emission unit ID, monitor ID, pollutant or parameter monitored, beginning date and time of the event, end date and time of the event, cause of the deviation or exceedance and corrective action taken.
- (B) Records of actions taken during periods of malfunction to minimize emissions in accordance with §§63.1506(a)(5) and 63.1520(a)(8), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- (12) For each period of startup or shutdown for which the owner or operator chooses to demonstrate compliance for an affected source, the owner or operator must comply with (b)(19)(i) or (ii) of this section.
- (A) To demonstrate compliance based on a feed/charge rate of zero, a flux rate of zero and the use of electricity, propane or natural gas as the sole sources of heating or the lack of heating, the owner or operator must submit a semiannual report in accordance with §63.1516(b)(2)(vii) or maintain the following records:
 - The date and time of each startup and shutdown;
- The quantities of feed/charge and flux introduced during each startup and shutdown; and
- The types of fuel used to heat the unit, or that no fuel was used, during startup and shutdown; or
- (B) To demonstrate compliance based on performance tests, the owner or operator must maintain the following records:
 - The date and time of each startup and shutdown;
- The measured emissions in lb/hr or μ g/hr or ng/hr;
- The measured feed/charge rate in tons/hr or Mg/hr from your most recent performance test associated with a production rate greater than zero, or the rated capacity of the affected source if no prior performance test data

is available; and

- (C) An explanation to support that such conditions are considered representative startup and shutdown operations.
- (13) For owners or operators that choose to change furnace operating modes, the following records must be maintained:
- (A) The date and time of each change in furnace operating mode, and
 - (B) The nature of the change in operating mode

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 18: Process Permissible Emissions

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 18.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 1-FURNS Process: 001

CAS No: 0NY075-00-0 Name: PARTICULATES

PTE(s): 3.08 pounds per hour

26,981 pounds per year

Emission Unit: 1-FURNS Process: 002

CAS No: 0NY075-00-0 Name: PARTICULATES

PTE(s): 0.09 pounds per hour

729 pounds per year

Emission Unit: 1-FURNS Process: 003

CAS No: 0NY075-00-0 Name: PARTICULATES

PTE(s): 0.92 pounds per hour

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7,128 pounds per year

Emission Unit: 1-FURNS Process: 004

CAS No: 0NY075-00-0 Name: PARTICULATES

PTE(s): 1.12 pounds per hour

8,618 pounds per year

Condition 19: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

The listed non-HTAC contaminants have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(a) by meeting either:

1- the degree of air cleaning required for the rating given to each contaminant, or

2- the NAAQS, or

3- the DAR-1 guideline concentrations.

The facility owner or operator shall verify the parameters used to demonstrate compliance with Table 3 or Table 4 annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions,

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increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating of any contaminant may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 20: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(m), Subpart RRR

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN



Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:

- (1) The owner or operator of a group 1 furnace utilizing a bag leak detection system must:
- (A) Initiate corrective action within 1 hour of a bag leak detection system alarm.
- (B) Complete the corrective action procedures in accordance with the OM&M plan. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- (C) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action.
- (2) Maintain the 3-hour block average inlet temperature for each fabric filter at or below the temperature limit established during the D/F testing.
- (3) For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established during the performance test.
- (4) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that



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will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 21: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1515(b), Subpart RRR

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For existing sources, the notification of compliance status report is due 60 days after the compliance date established in §63.1501(a). For new affected sources, the report is due within 90 days after conducting the initial performance test required by §63.1511(b), or within 90 days after the compliance date established by §63.1501(b) if no initial performance test is required. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the following information in an operating permit application, in an amendment to a permit application, in a separate submittal, or any combination. The notification of compliance status report must include:

1) All information required in §63.9(h) for notification of compliance status reports. The owner/operator must provide a complete performance test report for each affected source and emission unit for which a performance test is required. A complete performance test report

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includes all data, associated measurements, and calculations (including visible emission and opacity tests).

- 2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system)
- 3) Unit labeling as described in §63.1506(b), including process type or furnace classification and operating requirements.
- 4) The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., the lime injection rate, fabric filter inlet temperature, etc.), including the operating cycle or time period used in the performance test.
- 5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in §63.1506(c).
- 6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 63.1510(f).
- 7) Manufacturer's specification or analysis documenting the design residence time of no less than 1 second for each afterburner used to control emissions from a scrap dryer/delacquering kiln/decoating kiln subject to alternative emission standards in §63.1505(e).
- 8) Manufacturer's specification or analysis documenting the design residence time of no less than 2 seconds and design operating temperature of no less than 1600 degrees F for each afterburner used to control emissions from a sweat furnace that is not subject to a performance test.
- 9) Approved OM&M plan (Including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device)
- 10) Startup, shutdown, and malfunction plan, with revisions.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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Condition 22: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies once per batch of product while the process is in operation during daylight hours. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is



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inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 23: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications annually. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that

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ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site and a summary will be included in the annual monitoring reports. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.05 grains per dscf Reference Test Method: METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 24: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1505(k), Subpart RRR

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 24.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

The owner or operator must not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of D/F in excess of 15 μg of D/F TEQ per Mg (2.1 \times 10–4 gr of D/F TEQ per ton) of feed/charge.

The owner or operator of a may demonstrate compliance with the emission limits of this section by demonstrating that each emission unit within the SAPU is in compliance with the emission limit in this section.

With the prior approval of the Administrator, an owner or operator may redesignate any existing group 1 furnace at a secondary aluminum production facility as a new emission unit. Any emission unit so redesignated may thereafter be included in a new SAPU at that facility. Any such redesignation will be solely for the purpose of this NESHAP and will be irreversible.

Note: The equation for calculating the 3-day, 24-hour rolling average emissions of D/F is located in §63.1505(k)(3).

As an alternative to the calculating the 3-day, 24-hour rolling average each day an owner or operator may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

Upper Permit Limit: 15 micrograms of D/F TEQ per Mg

Reference Test Method: METHOD 23

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(c), Subpart RRR

Item 25.1:

The Compliance Demonstration activity will be performed for:



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Emission Unit: 1-FURNS

Process: 001

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

For each affected source or emission unit equipped with an add-on air pollution control device, the owner or operator must:

- (1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates or facial inlet velocities as contained in the ACGIH Guidelines (incorporated by reference, see §63.14);
- (2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and
- (3) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(b), Subpart RRR

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator must prepare and implement for each new or existing affected source and emission unit, a

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written OM&M plan. The owner or operator of an existing affected source must submit the OM&M plan to the Administrator no later than the compliance date established by \$63.1501(a). The OM&M plan must be submitted within 90 days after a successful initial performance test under \$63.1511(b), or within 90 days after the compliance date established by \$63.1501(b) if no initial performance test is required.

The plan must be accompanied by a written certification by the owner or operator that the OM&M plan satisfies all requirements of this section and is otherwise consistent with the requirements of this subpart. The owner or operator must comply with all of the provisions of the OM&M plan as submitted to the Administrator for area sources, unless and until the plan is revised in accordance with the following procedures.

If the Administrator determines at any time after receipt of the OM&M plan that any revisions of the plan are necessary to satisfy the requirements of this section or this subpart, the owner or operator must promptly make all necessary revisions and resubmit the revised plan. If the owner or operator determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the owner or operator submits a description of the changes and a revised plan incorporating them.

Each OM&M plan must contain the following information:

- (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
- (2) A monitoring schedule for each affected source and emission unit.
- (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in §63.1505.
- (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
- (A) Calibration and certification of accuracy of each



monitoring device, at least once every 6 months, according to the manufacturer's instructions; and

- (B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in subpart A of this part.
- (5) Procedures for monitoring process and control device parameters, including lime injection rates, procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in this section, including:
- (A) Procedures to determine and record the cause of any deviation or excursion, and the time the deviation or excursion began and ended; and
- (B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (8) Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limits and a site-specific monitoring plan as required in paragraph (o) of this section for each group 1 furnace not equipped with an add-on air pollution control device.
- (9) Procedures to be followed when changing furnace classifications under the provisions of §63.1514.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 60 days after the reporting period. The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Demonstration Effective between the dates of 12/28/2017 and 11/16/2027



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Applicable Federal Requirement: 40CFR 63.1510(f), Subpart RRR

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an affected source or emission unit using a fabric filter or lime-injected fabric filter to comply with the requirements of this subpart must install, calibrate, maintain, and continuously operate a bag leak detection system.

These requirements apply to the owner or operator of a new or existing affected source or existing emission unit using a bag leak detection system:

- (1) The owner or operator must install and operate a bag leak detection system for each exhaust stack of a fabric filter.
- (2) Each bag leak detection system must be installed, calibrated, operated, and maintained according to the manufacturer's operating instructions.
- (3) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
- (4) The bag leak detection system sensor must provide output of relative or absolute PM loadings.
- (5) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.
- (6) The bag leak detection system must be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located where it is easily heard by plant operating personnel.



(7) For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter.

- (8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (9) The baseline output must be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.
- (10) Following initial adjustment of the system, the owner or operator must not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 60 days after the reporting period. The initial report is due 3/1/2018. Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1510(h), Subpart RRR

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a group 1 furnace using a lime-injected fabric filter must install, calibrate, maintain, and operate a device to continuously monitor and

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record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in subpart A of this part.

The temperature monitoring device must meet each of the following performance and equipment specifications:

- (1) The monitoring system must record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period.
- (2) The recorder response range must include zero to 1.5 times the average temperature established during the performance test.
- (3) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1510(i), Subpart RRR

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a continuous lime injection system must verify that lime is always free-flowing by either:

(1) Inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must

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increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour period if corrective action results in no further blockages of lime during the 3-day period; or

- (2) Subject to the approval of the permitting agency, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the owner or operator must promptly initiate and complete corrective action, or
- (3) Subject to the approval of the permitting agency, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the owner or operator must promptly initiate and complete corrective action.

The owner or operator of a continuous lime injection system must record the lime feeder setting once each day of operation. An owner or operator who intermittently adds lime to a lime-injected fabric filter must obtain approval from the Administrator for a lime addition monitoring procedure. The Administrator will not approve a monitoring procedure unless data and information are submitted establishing that the procedure is adequate to ensure that relevant emission standards will be met on a continuous basis.

At least once per month, verify that the lime injection rate in pounds per hour (lb/hr) is no less than 90 percent of the lime injection rate used to demonstrate compliance during your most recent performance test. If the monthly check of the lime injection rate is below the 90 percent, the owner or operator must repair or adjust the lime injection system to restore normal operation within 45 days. The owner or operator may request an extension of up to an additional 45 days to demonstrate that the lime injection rate is no less than 90 percent of the lime injection rate used to demonstrate compliance during the most recent performance test.

In the event that a lime feeder is repaired or replaced, the feeder must be calibrated, and the feed rate must be restored to the lb/hr feed rate operating limit established during the most recent performance test within 45 days. The owner or operator may request an extension of up to an additional 45 days to complete the repair or



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replacement and establish a new setting. The repair or replacement, and the establishment of the new feeder setting(s) must be documented in accordance with the recordkeeping requirements of §63.1517.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(j), Subpart RRR

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a group 1 furnace must record the time, weight, and type of flux for each addition of solid reactive flux. This data shall be recorded for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs

The owner or operator of a group 1 furnace shall calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in §63.1512(o). For solid flux that is added intermittently, record the amount added for each operating cycle or time period used in the performance test using the procedures in §63.1512(o).

The owner or operator of a group 1 furnace performing reactive fluxing may apply to the Administrator for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator



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provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(s), Subpart RRR

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

An owner or operator of a secondary aluminum processing unit at a facility must include, within the OM&M plan prepared in accordance with §63.1510(b), the following information:

- (1) The identification of each emission unit in the secondary aluminum processing unit;
- (2) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;
- (3) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limit;
- (4) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and
- (5) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and,

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if applicable, the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in §63.1510(t).

To revise the SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to the Administrator containing the information required by the above paragraph and obtain approval of the Administrator prior to implementing any revisions.

The SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

- (1) Any averaging among emissions of differing pollutants;
- (2) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;
- (3) The inclusion of any emission unit while it is shutdown; or
- (4) The inclusion of any periods of startup or shutdown in emission calculations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(t), Subpart RRR

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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The owner or operator must calculate and record the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit on a daily basis. To calculate the 3-day, 24-hour rolling average, the owner or operator must:

- (1) Calculate and record the total weight of material charged to each emission unit in the secondary aluminum processing unit for each 24-hour day of operation using the feed/charge weight information required in §63.1510(e). If the owner or operator chooses to comply on the basis of weight of aluminum produced by the emission unit, rather than weight of material charged to the emission unit, all performance test emissions results and all calculations must be conducted on the aluminum production weight basis.
- (2) Multiply the total feed/charge weight to the emission unit, or the weight of aluminum produced by the emission unit, for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emission unit (as determined during the performance test) to provide emissions for each emission unit for the 24-hour period, in pounds. Where no performance test has been conducted, for a particular emission unit, because the owner of operator has, with the approval of the Administrator, chosen to determine the emission rate of an emission unit by testing a representative unit, in accordance with §63.1511(f), the owner or operator shall use the emission rate determined from the representative unit in the SAPU emission rate calculation required in §63.1510(t)(4).
- (3) Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU, or the weight of aluminum produced by the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- (4) Compute the 24-hour daily emission rate using Equation 4 in §63.1510(t)(4).
- (5) Calculate and record the 3-day, 24-hour rolling average each day by summing the daily emission rates over the 3 most recent consecutive days and dividing by 3. The SAPU is in compliance with an applicable emission limit if the 3-day, 24-hour rolling average is no greater than the applicable SAPU emission limit determined in accordance with §63.1505(k)(1)-(3).

As an alternative to the calculating the 3-day, 24-hour rolling average each day an owner or operator may



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demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(u), Subpart RRR

Item 33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In lieu of calculating and recording the 3-day, 24-hour rolling average emissions of D/F for each secondary aluminum processing unit on a daily basis the owner or operator shall demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 34: Alternative Monitoring

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1510(w), Subpart RRR

Item 34.1:

This Condition applies to Emission Unit: 1-FURNS

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Process: 001

Item 34.2:

If an owner or operator wishes to use an alternative monitoring method to demonstrate compliance with any emission standard in this subpart, other than those alternative monitoring methods which may be authorized pursuant to Sec. 63.1510(j)(5) and Sec. 63.1510(v), the owner or operator may submit an application to the Administrator. Any such application will be processed according to the criteria and procedures set forth in paragraphs (w)(1) through (6) of this section.

- (1) The Administrator will not approve averaging periods other than those specified in this section.
- (2) The owner or operator must continue to use the original monitoring requirement until necessary data are submitted and approval is received to use another monitoring procedure.
- (3) The owner or operator shall submit the application for approval of alternate monitoring methods no later than the notification of the performance test. The application must contain the information specified in paragraphs (w)(3) (i) through (iii) of this section:
- (i) Data or information justifying the request, such as the technical or economic infeasibility, or the impracticality of using the required approach;
- (ii) A description of the proposed alternative monitoring requirements, including the operating parameters to be monitored, the monitoring approach and technique, and how the limit is to be

calculated; and

- (iii) Data and information documenting that the alternative monitoring requirement(s) would provide equivalent or better assurance of compliance with the relevant emission standard(s).
- (4) The Administrator will not approve an alternate monitoring application unless it would provide equivalent or better assurance of compliance with the relevant emission standard(s). Before disapproving any alternate monitoring application, the Administrator will provide:
- (i) Notice of the information and findings upon which the intended disapproval is based; and
- (ii) Notice of opportunity for the owner or operator to present additional supporting information before final action is taken on the application. This notice will specify how much additional time is allowed for the owner or operator to provide additional supporting information.
- (5) The owner or operator is responsible for submitting any supporting information in a timely manner to enable the Administrator to consider the application prior to the performance test. Neither submittal of an application nor the Administrator's failure to approve or disapprove the application relieves the owner or operator of the responsibility to comply with any provisions of this subpart.
- (6) The Administrator may decide at any time, on a case-by-case basis, that additional or alternative operating limits, or alternative approaches to establishing operating limits, are necessary to demonstrate compliance with the emission standards of this subpart.

Condition 35: Compliance Demonstration
Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1511(b), Subpart RRR



Item 35.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 35.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Following approval of the site-specific test plan, the owner or operator must demonstrate initial compliance with each applicable emission, equipment, work practice, or operational standard for each affected source and emission unit, and report the results in the notification of compliance status report as described in §63.1515(b). The owner or operator of any affected source constructed or reconstructed after February 14, 2012, for which an initial performance test is required must conduct this initial performance test within 180 days after the date for compliance established by §63.1501. Except for the date by which the performance test must be conducted, the owner or operator must conduct each performance test in accordance with the requirements and procedures set forth in §63.7(c). Owners or operators of affected sources located at facilities which are area sources are subject only to those performance testing requirements pertaining to D/F.

Performance tests shall be conducted as follows:

- (1) The performance tests must be conducted under representative conditions expected to produce the highest level of HAP emissions expressed in the units of the emission standards for the HAP (considering the extent of feed/charge contamination, reactive flux addition rate and feed/charge rate). If a single test condition is not expected to produce the highest level of emissions for all HAP, testing under two or more sets of conditions (for example high contamination at low feed/charge rate, and low contamination at high feed/charge rate) may be required. Any subsequent performance tests for the purposes of establishing new or revised parametric limits shall be allowed upon pre-approval from the Administrator for area sources. These new parametric settings shall be used to demonstrate compliance for the period being tested.
- (2) Each performance test for a continuous process must consist of 3 separate runs; pollutant sampling for each



run must be conducted for the time period specified in the applicable method or, in the absence of a specific time period in the test method, for a minimum of 3 hours.

- (3) Each performance test for a batch process must consist of three separate runs; pollutant sampling for each run must be conducted over the entire process operating cycle. Additionally, for batch processes where the length of the process operating cycle is not known in advance, and where isokinetic sampling must be conducted based on the procedures in Method 5 in appendix A to part 60, use the following procedure to ensure that sampling is conducted over the entire process operating cycle:
- (i) Choose a minimum operating cycle length and begin sampling assuming this minimum length will be the run time (e.g., if the process operating cycle is known to last from four to six hours, then assume a sampling time of four hours and divide the sampling time evenly between the required number of traverse points);
- (ii) After each traverse point has been sampled once, begin sampling each point again for the same time per point, in the reverse order, until the operating cycle is complete. All traverse points as required by Method 1 of appendix A to part 60, must be sampled at least once during each test run;
- (iii) In order to distribute the sampling time most evenly over all the traverse points, do not perform all runs using the same sampling point order (e.g., if there are four ports and sampling for run 1 began in port 1, then sampling for run 2 could begin in port 4 and continue in reverse order.)
- (4) Where multiple affected sources or emission units are exhausted through a common stack, pollutant sampling for each run must be conducted over a period of time during which all affected sources or emission units complete at least 1 entire process operating cycle or for 24 hours, whichever is shorter.
- (5) Initial compliance with an applicable emission limit or standard is demonstrated if the average of three runs conducted during the performance test is less than or equal to the applicable emission limit or standard.
- (6) Apply paragraphs (b)(1) through (5) of this section for each pollutant separately if a different production rate, charge material or, if applicable, reactive fluxing



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rate would apply and thereby result in a higher expected emissions rate for that pollutant.

(7) The owner or operator may not conduct performance tests during periods of malfunction.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Establishment of Monitoring and Operating Parameter Values Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1511(g), Subpart RRR

Item 36.1:

This Condition applies to Emission Unit: 1-FURNS Process: 001

Item 36.2:

Establishment of monitoring and operating parameter values. The owner or operator of new or existing affected sources and emission units must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR Part 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the owner or operator must use the appropriate procedures in this section and submit the information required by 40 CFR Part 63.1515(b)(4) in the notification of compliance status report. The owner or operator may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the applicable permitting authority:

- (1) The complete emission test report(s) used as the basis of the parameter(s) is submitted.
- (2) The same test methods and procedures as required by this subpart were used in the test.
- (3) The owner or operator certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report.
- (4) All process and control equipment operating parameters required to be monitored were monitored as required in this subpart and documented in the test report.

Condition 37: Compliance Demonstration
Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1512(d)(1), Subpart RRR



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Item 37.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 37.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

> The owner or operator of a group 1 furnace that processes scrap other than clean charge materials with emissions controlled by a lime-injected fabric filter must conduct performance tests to measure emissions of D/F at the outlet of the control device.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 38: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement: 40CFR 63.1512(j), Subpart RRR

Item 38.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must conduct performance tests for each group 1 furnace that processes scrap other than clean charge to measure emissions of D/F. The results of the performance tests are used to establish emission rates in µg TEQ/Mg of feed/charge for D/F emissions from each emission unit. If applicable, these emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in §63.1510(t).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING **DESCRIPTION**

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 39: Compliance Demonstration

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Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1512(n), Subpart RRR

Item 39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001

Item 39.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a scrap dryer/delacquering kiln/decoating kiln or a group 1 furnace using a lime-injected fabric filter must use these procedures to establish an operating parameter value or range for the inlet gas temperature.

- (1) Continuously measure and record the temperature at the inlet to the lime-injected fabric filter every 15 minutes during the D/F performance tests;
- (2) Determine and record the 15-minute block average temperatures for the 3 test runs; and
- (3) Determine and record the 3-hour block average of the recorded temperature measurements for the 3 test runs.

Once the testing has been performed and an operating parameter value or range has been established, a permit modification shall be required to put the operating prameter value into the permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(m), Subpart RRR

Item 40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001 Emission Source: BAG01



Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:

- (1) The owner or operator of a group 1 furnace utilizing a bag leak detection system must:
- (A) Initiate corrective action within 1 hour of a bag leak detection system alarm.
- (B) Complete the corrective action procedures in accordance with the OM&M plan. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- (C) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action.
- (2) Maintain the 3-hour block average inlet temperature for each fabric filter at or below 292 Degrees Farenheit.
- (3) For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established during the performance test.



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(4) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.

Parameter Monitored: TEMPERATURE Upper Permit Limit: 292 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(m), Subpart RRR

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001 Emission Source: BAG02

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 41.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:

- (1) The owner or operator of a group 1 furnace utilizing a bag leak detection system must:
- (A) Initiate corrective action within 1 hour of a bag leak detection system alarm.
- (B) Complete the corrective action procedures in accordance with the OM&M plan. Corrective action must

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restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

- (C) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action.
- (2) Maintain the 3-hour block average inlet temperature for each fabric filter at or below 312 Degrees Farenheit.
- (3) For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established during the performance test.
- (4) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.

Parameter Monitored: TEMPERATURE Upper Permit Limit: 312 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).

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Condition 42: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable Federal Requirement:40CFR 63.1506(m), Subpart RRR

Item 42.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Process: 001 Emission Source: BAG03

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 42.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The owner or operator of a group 1 furnace with emissions controlled by a lime-injected fabric filter must:

- (1) The owner or operator of a group 1 furnace utilizing a bag leak detection system must:
- (A) Initiate corrective action within 1 hour of a bag leak detection system alarm.
- (B) Complete the corrective action procedures in accordance with the OM&M plan. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- (C) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month block reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of 1 hour. If the owner or operator takes longer than 1 hour to initiate corrective



action, the alarm time shall be counted as the actual amount of time taken by the owner or operator to initiate corrective action.

- (2) Maintain the 3-hour block average inlet temperature for each fabric filter at or below 288 Degrees Farenheit.
- (3) For a continuous lime injection system, maintain free-flowing lime in the hopper to the feed device at all times and maintain the lime feeder setting at or above the level established during the performance test.
- (4) The operation of capture/collection systems and control devices associated with natural gas-fired, propane-fired or electrically heated group 1 furnaces that will be idled for at least 24 hours after the furnace cycle has been completed may be temporarily stopped. Operation of these capture/collection systems and control devices must be restarted before feed/charge, flux or alloying materials are added to the furnace.

Parameter Monitored: TEMPERATURE Upper Permit Limit: 288 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2018.

Subsequent reports are due every 6 calendar month(s).



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STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS The following conditions are state only enforceable.

Condition 43: Contaminant List

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: ECL 19-0301

Item 43.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000050-00-0 Name: FORMALDEHYDE

CAS No: 000071-43-2 Name: BENZENE

CAS No: 001746-01-6

Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 007439-92-1

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Name: LEAD

CAS No: 007439-96-5 Name: MANGANESE

CAS No: 007439-97-6 Name: MERCURY

CAS No: 007440-02-0

Name: NICKEL METAL AND INSOLUBLE COMPOUNDS

CAS No: 007440-38-2 Name: ARSENIC

CAS No: 007440-41-7 Name: BERYLLIUM

CAS No: 007440-43-9 Name: CADMIUM

CAS No: 007440-47-3 Name: CHROMIUM

CAS No: 0NY075-00-0 Name: PARTICULATES

CAS No: 0NY100-00-0 Name: TOTAL HAP

Condition 44: Malfunctions and start-up/shutdown activities

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 201-1.4

Item 44.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.



- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 45: Emission Unit Definition

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 45.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-FURNS Emission Unit Description:

This emission unit consists of three (3) 20 mmbtu/hr natural gas fired rotary furnaces (process 001) used to melt scrap aluminum. Each furnace is equipped with a baghouse for particulate matter control and a ph system (ammonia injection system and/or lime injection) for acid gas control. Associated operations consist of pouring and casting (process 002); passive salt cake cooling (process 003) and rotary salt cake cooler (process 004).

Building(s): MAIN

Condition 46: Renewal deadlines for state facility permits

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 46.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 47: Compliance Demonstration



Permit ID: 8-4532-00105/00001 Facility DEC ID: 8453200105

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 201-5.3 (c)

Item 47.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 47.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources NYS Dept. of Environmental Conservation Region 8 6274 East Avon-Lima Rd. Avon, NY 14414

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2018. Subsequent reports are due every 12 calendar month(s).

Condition 48: Visible Emissions Limited

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 211.2

Item 48.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**** Emission Unit Level ****

Condition 49: Emission Point Definition By Emission Unit

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 49.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-FURNS



Emission Point: 00001 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00002 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00003 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00004 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00005 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00006 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00007 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00008 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00009 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00010 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00011 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00012 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN
Emission Point: 00013 Height (ft.): 53 NYTMN (km.): 4753.6	Diameter (in.): 24 NYTME (km.): 354.3	Building: MAIN

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Emission Point: 00014

Height (ft.): 53 Diameter (in.): 24

NYTMN (km.): 4753.6 NYTME (km.): 354.3 Building: MAIN

Emission Point: 00015

Height (ft.): 53 Diameter (in.): 24

NYTMN (km.): 4753.6 NYTME (km.): 354.3 Building: MAIN

Emission Point: 00016

Height (ft.): 53 Diameter (in.): 24

NYTMN (km.): 4753.6 NYTME (km.): 354.3 Building: MAIN

Emission Point: 00017

Height (ft.): 53 Diameter (in.): 24

NYTMN (km.): 4753.6 NYTME (km.): 354.3 Building: MAIN

Emission Point: 00018

Height (ft.): 53 Diameter (in.): 24

NYTMN (km.): 4753.6 NYTME (km.): 354.3 Building: MAIN

Condition 50: Process Definition By Emission Unit

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 50.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-FURNS

Process: 001

Process Description:

PROCESS 001 CONSISTS OF THE ROTARY FURNACE COMPLEX. THE MELTING (INCLUDING NATURAL GAS COMBUSTION) AND FLUXING OPERATIONS OF THE ROTARY FURNACE COMPLEX. PARTICULATE EMISSIONS ARE CONTROLLED BY A MULTI COMPARTMENT BAGHOUSE. ACID GAS EMISSIONS ARE CONTROLLED BY A PH SYSTEM AND/OR LIME INJECTION. THE PH CONTROL SYSTEM INJECTS AMMONIA INTO THE GAS STREAM TO REACT WITH THE ACID GASES GENERATING A PARTICULATE WHICH IS CAPTURED BY THE BAGHOUSE. LIME IS INJECTED VIA PNEUMATIC DUCT UPSTREAM OF THE BAGHOUSE.

Emission Source/Control: FURN1 - Combustion Design Capacity: 20 million Btu per hour

Emission Source/Control: FURN2 - Combustion Design Capacity: 20 million Btu per hour

Emission Source/Control: FURN3 - Combustion



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Design Capacity: 20 million Btu per hour

Emission Source/Control: BAG01 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BAG02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BAG03 - Control

Control Type: FABRIC FILTER

Emission Source/Control: PHC01 - Control Control Type: AMMONIA INJECTION

Emission Source/Control: PHC02 - Control Control Type: AMMONIA INJECTION

Emission Source/Control: PHC03 - Control Control Type: AMMONIA INJECTION

Item 50.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-FURNS

Process: 002

Process Description:

PROCESS 002 CONSISTS OF THE POURING AND CASTING OPERATIONS OF THE ROTARY FURNACES. ONCE THE DESIRED METAL COMPOSITION IS ACHIEVED, THE ALUMINUM IS CAST BY POURING THE MOLTEN METAL INTO MOLDS. EMISSIONS FROM THIS OPERATION ARE FUGITIVE IN NATURE

(IE., DOORWAYS, WINDOWS, ETC.)

Emission Source/Control: CAST1 - Process

Emission Source/Control: CAST2 - Process

Emission Source/Control: CAST3 - Process

Item 50.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-FURNS

Process: 003 Process Description:

PROCESS 3 CONSISTS OF THE SALT CAKE
COOLING AREA OF THE ROTARY FURNACE. DURING
MELTING, FLUXING AGENTS ARE ADDED TO THE
ROTARY FURNACE. THE FLUX COMBINES WITH
CONTAMINANTS IN THE METAL AND FLOATS TO THE
SURFACE, TRAPPING THE IMPURITIES IN A SALT



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CAKE. THE SALT CAKE IS THEN PHYSICALLY REMOVED FROM THE SURFACE AND PLACED IN NEARBY BINS WHERE IT IS ALLOWED TO COOL. EMISSIONS FROM THIS OPERATION ARE FUGUTIVE IN NATURE.

Emission Source/Control: SALT1 - Process

Emission Source/Control: SALT2 - Process

Emission Source/Control: SALT3 - Process

Item 50.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-FURNS

Process: 004

Process Description:

PROCESS 004 ALSO CONSISTS OF THE DROSS/SALT CAKE COOLING OPERATIONS OF THE ROTARY FURNACE. DURING MELTING FLUXING AGENTS ARE ADDED TO THE ROTARY FURNACE. THE FLUX COMBINES WITH CONTAMINANTS IN THE METAL AND FLOATS TO THE SURFACE, TRAPPING THE IMPURITIES. AFTER THE MOLTEN ALUMINUM IS DRAINED FROM THE FURNACE, THE IMPURITIES (SALT CAKE) ARE THEN PHYSICALLY REMOVED FROM THE FURNACE AND PLACED IN STEEL MOLDS WHERE IT IS TRANSFERRED INTO THE DROSS COOLER. EMISSIONS FROM THE COOLER AND ASSOCIATED HOODS ARE EXHAUSTED TO A BAGHOUSE WHOSE STACK IS EXHAUSTED OUTSIDE.

Emission Source/Control: BAG04 - Control

Control Type: FABRIC FILTER

Emission Source/Control: SALT4 - Process

Condition 51: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 51.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 51.2:

Air Pollution Control Permit Conditions
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Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

Formaldehyde has been given an Environmental Rating of A for the process emission sources identified. Emissions of Formaldehyde have been demonstrated to be in compliance with 6 NYCRR Part 212. Formaldehyde emissions shall continue to meet the annual and short term guideline concentration values.

Any proposed increase in Formaldehyde emissions that would result in an ERP of greater than or equal to 0.1 pounds per hour shall require a permit modification prior to implementation of such increase.

The facility owner or operator shall verify the parameters used to demonstrate compliance annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment,



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in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: FORMALDEHYDE Upper Permit Limit: 0.1 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 52: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 52.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 007439-96-5 MANGANESE CAS No: 007440-47-3 CHROMIUM

Item 52.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

Chromium and Manganese have been given an Environmental Rating of A for the process emission sources identified. Emissions of the above listed HAPs have been demonstrated to be in compliance with 6 NYCRR Part 212. Chromium and Manganese emissions shall continue to meet the 90% degree



of air cleaning required.

Any proposed increase in Chromium or Manganese emissions that would result in an ERP of greater than or equal to 10 pounds per hour shall require a permit modification prior to implementation of such increase.

The facility owner or operator shall verify the parameters used to demonstrate compliance annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: TOTAL HAP Upper Permit Limit: 10 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2018. Subsequent reports are due every 12 calendar month(s).

Condition 53: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 53.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 000071-43-2 BENZENE

Item 53.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

Benzene has been given an Environmental Rating of A for the process emission sources identified. Emissions of Benzene have been demonstrated to be in compliance with 6 NYCRR Part 212. Benzene emissions shall continue to meet the annual and short term guideline concentration values.

Any proposed increase in Benzene emissions that would result in annual emissions of greater than 100 pounds per year shall require a permit modification prior to implementation of such increase.

The facility owner or operator shall verify the parameters used to demonstrate compliance annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will



require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: BENZENE

Upper Permit Limit: 100 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 54: Compliance Demonstration

Effective between the dates of 12/28/2017 and 11/16/2027

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 54.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FURNS

Regulated Contaminant(s):

CAS No: 007439-92-1 LEAD CAS No: 007439-97-6 MERCURY

CAS No: 007440-02-0 NICKEL METAL AND INSOLUBLE

COMPOUNDS



Permit ID: 8-4532-00105/00001 Facility DEC ID: 8453200105

CAS No: 007440-41-7 BERYLLIUM CAS No: 007440-43-9 CADMIUM ARSENIC

Item 54.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

Arsenic, Beryllium, Cadmium, Lead, Mercury and Nickel have been given an Environmental Rating of A for the process emission sources identified. Emissions of the above listed metallic HAPs have been demonstrated to be in compliance with 6 NYCRR Part 212. Arsenic, Beryllium, Cadmium, Lead, Mercury and Nickel emissions shall continue to meet the annual and short term guideline concentration values.

Any proposed increase in Arsenic, Beryllium, Cadmium, Lead, Mercury and Nickel emissions that would result in an ERP of greater than or equal to 10 pounds per hour shall require a permit modification prior to implementation of such increase.

The facility owner or operator shall verify the parameters used to demonstrate compliance annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the



facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the annual compliance monitoring report.

Parameter Monitored: TOTAL HAP Upper Permit Limit: 10 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).